

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PATSY JAY,

Plaintiff,

v.

Case No.: 3:23-cv-656

GRAND MANAGEMENT SERVICES, INC., EVERGREEN GARDENS
LIMITED PARTNERSHIP, JERRY MASCOLO, LEONDR A COLEMAN,
and DAWN COCKRUM,

Defendants.

DEPOSITION OF
DAWN COCKRUM

TAKEN ON
MONDAY, JULY 29, 2024
12:59 P.M.

OREGON LAW CENTER
490 NORHT SECOND STREET
COOS BAY, OREGON 97420

DAWN COCKRUM
76339

July 29, 2024

2 to 5

Page 2	Page 4
<p>1 APPEARANCES</p> <p>2</p> <p>3 Appearing on behalf of the Plaintiff:</p> <p>4 CARLY CRIPPS, ESQUIRE</p> <p>5 Oregon Law Center</p> <p>6 230 NE 2nd Avenue, Suite F</p> <p>7 Hillsboro, OR 97124</p> <p>8 (503) 640-4115</p> <p>9 (503) 640-9634 (Fax)</p> <p>10 ccripps@oregonlawcenter.org</p> <p>11</p> <p>12 -and-</p> <p>13</p> <p>14 Appearing on behalf of the Plaintiff:</p> <p>15 NICOLE PRITCHARD, ESQUIRE</p> <p>16 WILLIAM B. NIESE, ESQUIRE</p> <p>17 Oregon Law Center</p> <p>18 490 N. 2nd Street</p> <p>19 Coos Bay, OR 97240</p> <p>20 (541) 269-1226</p> <p>21 (541) 269-1372 (Fax)</p> <p>22 npritchard@oregonlawcenter.org</p> <p>23 bniese@oregonlawcenter.org</p> <p>24</p> <p>25</p>	<p>1 EXAMINATION INDEX</p> <p>2 Page</p> <p>3 EXAMINATION BY MS. CRIPPS 7</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 3	Page 5
<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 Appearing on behalf of Defendant Grand Management,</p> <p>4 Jerry Mascolo, Leondra Coleman, Dawn Cockrum:</p> <p>5 HEIDI L. MANDT, ESQUIRE</p> <p>6 Williams Kastner</p> <p>7 1515 SW 5th Avenue, Suite 600</p> <p>8 Portland, OR 97201</p> <p>9 (503) 228-7967</p> <p>10 (503) 222-7261 (Fax)</p> <p>11 hmandt@williamskastner.com</p> <p>12</p> <p>13 Appearing on behalf of Defendant</p> <p>14 Evergreen Gardens Limited Partnership:</p> <p>15 NATHAN B. MCCLINTOCK, ESQUIRE</p> <p>16 Corrigall & McClintock LLP</p> <p>17 936 Central Avenue</p> <p>18 Coos Bay, OR 97420</p> <p>19 (541) 269-1123</p> <p>20 (541) 269-1126 (Fax)</p> <p>21 nmcclintock@epuerto.com</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 EXHIBIT INDEX</p> <p>2 Page</p> <p>3 EX037 Certificate 14</p> <p>4</p> <p>5 EX038 Fax Dated 8-27-2021 24</p> <p>6</p> <p>7 EX039 Email Dated 3-14-2019 30</p> <p>8</p> <p>9 EX040 14 Day Status of Eviction Notice 40</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 6</p> <p>1 DEPOSITION OF</p> <p>2 DAWN COCKRUM</p> <p>3 TAKEN ON</p> <p>4 MONDAY, JULY 29, 2024</p> <p>5 12:59 P.M.</p> <p>6</p> <p>7 THE REPORTER: All right. The time is</p> <p>8 12:59. We are on the record.</p> <p>9 This is the beginning of the deposition of</p> <p>10 Dawn Cockrum.</p> <p>11 Ms. Cockrum, can I have you raise your</p> <p>12 right hand?</p> <p>13 Do you affirm under penalty of perjury the</p> <p>14 testimony you're about to give will be the truth,</p> <p>15 the whole truth, and nothing but the truth?</p> <p>16 THE DEPONENT: I do.</p> <p>17 THE REPORTER: Thank you.</p> <p>18 Counsel, please introduce yourselves and</p> <p>19 state who you represent.</p> <p>20 MS. CRIPPS: Carly Cripps, for the</p> <p>21 plaintiff.</p> <p>22 MR. MCCLINTOCK: Nathan McClintock, for</p> <p>23 Evergreen.</p> <p>24 MS. MANDT: Heidi Mandt, for Grand</p> <p>25 Management Services and the individual defendants.</p>	<p style="text-align: right;">Page 8</p> <p>1 today that would affect your ability to answer the</p> <p>2 questions completely and truthfully?</p> <p>3 A. No.</p> <p>4 Q. Okay. Okay. Great. And then have you</p> <p>5 ever been a party or a witness to a lawsuit?</p> <p>6 A. No.</p> <p>7 Q. You've never testified in court. Nothing</p> <p>8 like that? Okay.</p> <p>9 A. (No audible response.).</p> <p>10 Q. Okay. Great. Can -- did you say and</p> <p>11 spell your full name already?</p> <p>12 A. (No audible response.).</p> <p>13 Q. No. Can you say and spell your full name?</p> <p>14 A. Dawn A. Cockrum, D-A-W-N, A, C-O-C-K-R-U-</p> <p>15 M.</p> <p>16 Q. Thank you. And then have you had any</p> <p>17 prior names?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Can you tell us what that is?</p> <p>20 A. Last name, Stout, S-T-O-U-T. Last name,</p> <p>21 Snook, S-N-O-O-K. Maiden name, Potes, P-O-T-E-S.</p> <p>22 Q. Thanks. Okay. And what have you done to</p> <p>23 prepare for your deposition?</p> <p>24 A. Well, I read the -- the -- the court</p> <p>25 paperwork on who, you know, Patsy Jay with us and</p>
<p style="text-align: right;">Page 7</p> <p>1 THE REPORTER: You may proceed.</p> <p>2 DAWN COCKRUM, having been first duly affirmed to</p> <p>3 tell the truth, was examined, and testified as</p> <p>4 follows:</p> <p>5 EXAMINATION</p> <p>6 BY MS. CRIPPS:</p> <p>7 Q. Okay. Hi, Dawn. I'm Carly. I'm going to</p> <p>8 be taking your deposition. Just a few things before</p> <p>9 we really dive in here. Have you ever had your</p> <p>10 deposition taken before?</p> <p>11 A. No.</p> <p>12 Q. Okay. Okay. So whenever you answer I'm</p> <p>13 going to ask that you answer out loud like you just</p> <p>14 did. No head nodding or mm-hhms. We need verbal</p> <p>15 yeses or nos.</p> <p>16 And then as Ryan here mentioned, we're</p> <p>17 going to try not to talk over each other. And that</p> <p>18 can be a little bit hard sometimes because, you</p> <p>19 know, the way conversation works, but we're going to</p> <p>20 try not to talk over each other.</p> <p>21 And then if you need a break at any time</p> <p>22 you're welcome to do so except when a question is</p> <p>23 pending. So we just need you to answer a question</p> <p>24 before we take a break.</p> <p>25 Have you taken any drugs or medication</p>	<p style="text-align: right;">Page 9</p> <p>1 the explanations of what the language means. Like,</p> <p>2 complaints and all that. And just trying remember</p> <p>3 because it's been three years ago.</p> <p>4 Q. Okay. What about -- did you look at any</p> <p>5 documents other than the complaint that you just</p> <p>6 mentioned?</p> <p>7 A. No.</p> <p>8 Q. Okay.</p> <p>9 A. No.</p> <p>10 Q. Okay. Have you talked to your -- anyone</p> <p>11 other than your attorney to prepare?</p> <p>12 A. No.</p> <p>13 Q. Okay. When was the last time you spoke</p> <p>14 with Jerry Mascolo?</p> <p>15 A. Recently. He's -- what is just business-</p> <p>16 wise. He asked me some opinions on -- on</p> <p>17 management. And, Grand Management recently</p> <p>18 purchased three of my company's properties, so</p> <p>19 nothing to do with this case, just property</p> <p>20 management.</p> <p>21 Q. Okay. So the two of you are friendly?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. What about Kristin Smith?</p> <p>24 A. Not really. Besides saying hi and all</p> <p>25 that when I come here, but, no.</p>

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1 Q. Okay.

2 A. No.

3 Q. How often do you come here?

4 A. This is the first time in a year and a

5 half.

6 Q. Okay. Okay. What about Leondra Coleman?

7 Have you spoken to her?

8 A. No.

9 Q. Okay. What about John McKnight?

10 A. No.

11 Q. When's the last time you spoke to him?

12 A. I couldn't --

13 Q. If you know.

14 A. -- respond to that. It's --

15 Q. Okay. Who's your current employer?

16 A. Neighborworks Umpqua.

17 Q. Okay. And how long have you worked there?

18 A. A total of 21 years. I worked there 19

19 years, left in '19, came to Grand Management for two

20 years, and went back in 2021.

21 Q. Okay. So can --

22 A. So a total of 23 -- 21 years.

23 Q. Okay. Twenty-one years. Can you tell me

24 the dates of your employment with Grand?

25 A. Mm-hmm. September 1st, 2019, to November

Page 11

1 10th, 2021.

2 Q. Okay. November 10th of '21. Okay. So --

3 and you worked at Neighborworks both before and

4 after that?

5 A. Mm-hmm.

6 Q. Immediately before and after. Okay. And

7 then what was your job title when you worked at

8 Grand Management?

9 A. Senior compliance specialist.

10 Q. Okay. Can you kind of describe what your

11 role was?

12 A. I oversaw the recertifications, making

13 sure they were being done on time and the paperwork

14 and gave the approval to the managers to close them

15 out. I reviewed all the violation notices, make

16 sure the language is correct and we were doing what

17 we were supposed to. And then Jerry Mascolo would

18 be the ultimate overseer of approving those.

19 Q. Okay. And recertifications. Is that of

20 individual tenants?

21 A. Yes. Every year they have to recertify

22 their income, household composition, because their

23 rent is based off their income. So --

24 Q. Right.

25 A. -- it's a requirement.

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1 Q. Right. And then violation notices. Is

2 that lease violation notices?

3 A. Yes.

4 Q. Okay. So those would be given to

5 individual tenants as well?

6 A. Yes.

7 Q. Okay. So you reviewed every violation

8 notice that went out?

9 A. Not every violation.

10 Q. Okay. How -- how --

11 A. The majority of them.

12 Q. The majority.

13 A. Mm-hmm.

14 Q. Okay. Can you give me an estimate, is

15 that like 60 percent, or like 90 percent?

16 A. I'd say 85.

17 Q. Okay. Okay. Can you tell me why you

18 ended your employment there?

19 A. Because my old employer offered me to come

20 back in a better deal.

21 Q. Okay. Fair enough. So there was no

22 hostility?

23 A. Oh, no.

24 Q. Or anything --

25 A. No.

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1 Q. -- like that. Okay. And then senior

2 compliance specialist, is that the only job title

3 you had while you were there?

4 A. Mm-hmm.

5 Q. Okay. So you were never promoted or moved

6 to a different --

7 A. No.

8 Q. -- position? Okay. And then compliance.

9 Compliance with what? Can you tell me what means?

10 A. It's very broad. Basically, I oversee all

11 the regulatory requirement paperwork.

12 Q. Okay. Okay. So that means, like,

13 compliance with the law and compliant with --

14 A. Mm-hmm.

15 Q. -- regulatory --

16 A. Mm-hmm. Reasonable accommodations.

17 Recertifications. Violation notices.

18 Q. Okay.

19 THE REPORTER: Just a friendly reminder,

20 you're saying mm-hmm a lot. Remember to say yes or

21 no. It's okay.

22 MS. CRIPPS: Thanks.

23 THE REPORTER: Just a friendly reminder.

24 MS. CRIPPS: It happens. No worries.

25 BY MS. CRIPPS:

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1 Q. Okay. As part of your employment did you
2 receive training on fair housing laws?

3 A. Yes. I've taken at least two fair housing
4 trainings since 2001, a year.

5 Q. Okay. Got it. One second here. Let me
6 dig out a piece of paperwork.

7 MS. CRIPPS: Okay. This will be Exhibit
8 37, 37, right?

9 (WHEREUPON, Exhibit 37 was marked for
10 identification.)

11 BY MS. CRIPPS:

12 Q. Okay. So this document that I just handed
13 you, can you tell us what it is?

14 A. Is a certification of attending a fair
15 housing certification course.

16 Q. Okay. And that's dated 2020 --

17 A. Mm-hmm.

18 Q. -- correct? Okay. So did you do other
19 fair housing training while you were at Grand
20 Management other than the -- this one certification?

21 A. I'd already had two certifications when
22 they hired me in '19, so that was sufficient for the
23 year '19.

24 Q. Okay.

25 A. And I left before they were getting ready

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1 to do the 2021 one, so I did the --

2 Q. Okay.

3 A. -- 2020 with them.

4 Q. Okay.

5 A. There. But --

6 Q. Got it. So you only did one in 2020?

7 A. With --

8 Q. You said --

9 A. -- Grand Management.

10 Q. -- you do two a year.

11 A. Yeah.

12 Q. Okay. Got it. And as part of the fair
13 housing certification course can you tell us what
14 that covered? What you learned in that course?

15 A. In this particular one?

16 Q. Yes.

17 A. This is the basic fair housing. I take
18 several a year usually. This one goes over the
19 basics of fair housing. It goes over
20 discrimination. It goes over reasonable
21 accommodations. It goes over companion assistance
22 animals versus pets.

23 It goes over all your discriminations from
24 tenant-on-tenant harassment to racial to gender, all
25 -- all the protected classes.

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1 It goes over the landlord's responsibility
2 to address things and when in the timeframes of it.
3 And then they always give you a few examples of what
4 -- what can happen if you don't comply with what
5 you're responsible to as a landlord.

6 Q. Okay. So this training included training
7 on how to deal with tenant-on-tenant conflicts?

8 A. Yes.

9 Q. Okay. Can you tell us how it -- like,
10 what does it say to do?

11 A. It was very basic.

12 Q. Okay.

13 A. They did encourage you to take -- like,
14 some companies have their lawyers that put on one a
15 year. But the basic was once the landlord or
16 managing agent becomes aware of a tenant-on-tenant
17 harassment we need to do our due diligence,
18 investigate, and see if we have a role to play in
19 that.

20 Q. Okay. And does this training kind of give
21 you an idea of what an investigation would entail?

22 A. They gave one example of -- of a
23 situation, but that's as far as they go into it.

24 Q. Okay.

25 A. They always advise you to seek your legal

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1 counsel if you're unsure on how to approach
2 something.

3 Q. Okay. And so did this training also cover
4 sexual harassment?

5 A. Briefly.

6 Q. Briefly.

7 A. Mm-hmm.

8 Q. Okay. And then did it give you kind of
9 instructions on how to investigate tenant-on-tenant
10 sexual harassment?

11 A. Briefly.

12 Q. Okay. And can you tell us what those
13 instructions were?

14 A. You take the resident's complaint. And
15 then you ask around to see if anyone -- any other
16 residents heard it, witnessed it. And then you
17 approach -- you just respond back and it -- it
18 evolves from there.

19 Q. Okay. Okay. So if a tenant complained of
20 sexual harassment by another tenant would you be in
21 charge of investigating that?

22 A. With Grand Management?

23 Q. Yes. As part of your role at Grand
24 Management?

25 A. Not at first, no.

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<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. But eventually the answer would</p> <p>2 have been yes?</p> <p>3 A. If it came to fruition where it was needed</p> <p>4 further follow through.</p> <p>5 Q. Okay. What would -- in what circumstance</p> <p>6 would it come to fruition that needed follow</p> <p>7 through? What would that be?</p> <p>8 A. I need a specific scenario. That's kind</p> <p>9 of a vague question.</p> <p>10 Q. Fair enough. Yeah. Okay. We'll go back</p> <p>11 a little bit. So did this training cover how to a</p> <p>12 handle situation if a tenant sexually harassed an</p> <p>13 employee?</p> <p>14 A. No.</p> <p>15 Q. Okay. And in that situation would you be</p> <p>16 in charge of investigating if that was reported?</p> <p>17 A. Not at first.</p> <p>18 Q. Okay. But eventually in your role at</p> <p>19 Grand Management if an employee reported sexual</p> <p>20 harassment by a tenant you would have been in charge</p> <p>21 of investigating that?</p> <p>22 A. I'm not necessarily sure I'd be in charge,</p> <p>23 but I would be part of the -- the effort.</p> <p>24 Q. Okay.</p> <p>25 A. -- of --</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. -- the last --</p> <p>2 A. -- 24-hour.</p> <p>3 Q. Okay. And can you tell me what happened</p> <p>4 that -- what was the outrageous behavior that</p> <p>5 required the 24-hour notice?</p> <p>6 A. Meth lab in the unit.</p> <p>7 Q. Okay. That will do it. Okay. So let's</p> <p>8 see. Any duties of your job that we haven't covered</p> <p>9 that you can think of?</p> <p>10 A. No.</p> <p>11 Q. While you were at Grand, I mean.</p> <p>12 A. No.</p> <p>13 Q. Okay. Okay. And what was the location in</p> <p>14 which you worked for Grand Management?</p> <p>15 A. At the office here.</p> <p>16 Q. Okay. Here in --</p> <p>17 A. Mm-hmm. Coos Bay. Right there, 420.</p> <p>18 Q. Okay. Did you ever go to Evergreen</p> <p>19 Gardens?</p> <p>20 A. I did not.</p> <p>21 Q. Okay. Oh, how would you receive</p> <p>22 complaints from tenants?</p> <p>23 A. Several ways. The lease states all</p> <p>24 complaints need to be in writing, so they would go</p> <p>25 to the manager and the manager would email them to</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. So you would have been involved --</p> <p>2 A. Mm-hmm.</p> <p>3 Q. -- in the investigation. Okay. And then</p> <p>4 would it -- would -- would you also have been</p> <p>5 involved in the decision on how to respond to that?</p> <p>6 A. I would have.</p> <p>7 Q. Okay. And are you aware of the option</p> <p>8 under the fair housing laws to give someone a 24-</p> <p>9 hour eviction notice for outrageous behavior?</p> <p>10 A. Very familiar.</p> <p>11 Q. Okay. Have you ever done that --</p> <p>12 A. Yeah.</p> <p>13 Q. -- in your role with Grand Management?</p> <p>14 A. Not with Grand Management. No.</p> <p>15 Q. Okay. But you have done that at</p> <p>16 Neighborworks?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Can you tell me when?</p> <p>19 A. Again, can't get specific, that's -- I do</p> <p>20 a lot of these notices, hundreds a year. Not 24</p> <p>21 hours, but violation notices. I would have to say</p> <p>22 the last one would have been around February of this</p> <p>23 year.</p> <p>24 Q. The last violation notice or --</p> <p>25 A. The --</p>	<p style="text-align: right;">Page 21</p> <p>1 me.</p> <p>2 Q. Okay.</p> <p>3 A. Occasionally you'd get a phone call.</p> <p>4 Q. Phone call from who?</p> <p>5 A. The -- the complainer. The complainer</p> <p>6 (sic).</p> <p>7 Q. From the tenant?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. Mm-hmm.</p> <p>11 Q. What about through AppFolio?</p> <p>12 A. No.</p> <p>13 Q. Okay.</p> <p>14 A. We log notes in AppFolio on</p> <p>15 correspondences where I would keep a record of what</p> <p>16 was said because I always have to tell the tenant,</p> <p>17 please, put this in writing.</p> <p>18 Q. Mm-hmm.</p> <p>19 A. I'll take your note, but, yeah.</p> <p>20 Q. Okay. So you reviewed AppFolio and the</p> <p>21 notes in AppFolio?</p> <p>22 A. Occasionally, yes.</p> <p>23 Q. Okay. So when someone entered a note</p> <p>24 about a tenant in AppFolio did you get a</p> <p>25 notification regarding that?</p>

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46 to 49


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1 A. They allow -- it was when I was there.
 2 Q. Okay.
 3 A. Mm-hmm.
 4 Q. Is that the policy for -- in every
 5 situation?
 6 A. When I was there, yes.
 7 Q. Okay. So every time someone violated the
 8 lease they received a courtesy notice --
 9 A. It would --
 10 Q. -- for the --
 11 A. -- depend on the violation.
 12 Q. Okay. Sorry. If GMS was going to evict
 13 someone, would they send a courtesy notice in every
 14 situation?
 15 A. I can't answer that right now.
 16 Q. Okay.
 17 A. When I was there, we were doing it. I
 18 don't know what they're doing now.
 19 Q. Okay. Thank you. I did -- I worked that
 20 poorly, thank you for answering that well. Okay.
 21 Okay.
 22 MS. CRIPPS: Okay. I think that's all my
 23 questions.
 24 MR. MCCLINTOCK: I don't have any
 25 questions.

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1 MS. MANDT: No questions.
 2 MS. CRIPPS: Okay.
 3 THE REPORTER: All right. That concludes
 4 the deposition.
 5 Ms. Cripps, would you like to order the
 6 transcript?
 7 MS. CRIPPS: Yes, please.
 8 THE REPORTER: Ms. Mandt --
 9 MS. MANDT: Yes.
 10 THE REPORTER: -- would you like a copy?
 11 And, Mr. McClintock.
 12 MR. MCCLINTOCK: Yes.
 13 THE REPORTER: Alrighty. Going off the
 14 record at 1:53.
 15 (WHEREUPON, the deposition of DAWN COCKRUM
 16 was concluded at 1:53 p.m.)
 17
 18
 19
 20
 21
 22
 23
 24
 25

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1 CERTIFICATE
 2
 3 I, Ryan Batterson, do hereby certify that I
 4 reported all proceedings adduced in the foregoing
 5 matter and that the foregoing transcript pages
 6 constitutes a full, true and accurate record of said
 7 proceedings to the best of my ability.
 8
 9 I further certify that I am neither related
 10 to counsel or any party to the proceedings nor have
 11 any interest in the outcome of the proceedings.
 12
 13 IN WITNESS WHEREOF, I have hereunto set my hand
 14 this 15th day of August, 2024.
 15
 16 
 17
 18
 19 Ryan Batterson
 20
 21
 22
 23
 24
 25

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1 CORRECTION SHEET
 2 Deposition of: Dawn Cockrum Date: 07/29/24
 3 Regarding: Jay vs. Grand Management Services, Inc.
 4 Reporter: Batterson / Munro
 5 _____
 6 Please make all corrections, changes or
 7 clarifications to your testimony on this sheet,
 8 showing page and line number. If there are no
 9 changes, write "none" across the page. Sign this
 10 sheet and the line provided.
 11 Page Line Reason for Change
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 Signature: _____
 25 Dawn Cockrum

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DECLARATION

Deposition of: Dawn Cockrum Date: 07/29/2024

Regarding: PATSY JAY vs GRAND MANAGEMENT SERVICES

Reporter: Ryan Batterson

I declare under panalty of perjury the following to be true:

I have read my deposition and the same is true and accurate save and except for any corrections as made by me on the Correction Sheet herein.

Signed at _____, _____
on the _____ day of _____, 20____.

Signature: _____
Dawn Cockrum